

RCRA PRELIMINARY ASSESSMENT SUMMARY
Region VI, Technical Compliance Section

FACILITY'S NAME(S): American Petrofina Co.

EPA ID NUMBER: TXD065099160

ADDRESS: Hwy 36S and 32nd St.

LOCATION: Port Arthur, TX

PREPARED BY: TWC, Richard Andersen DATE PREPARED: April 17, 1986

REVIEWED BY: Tanya Winkle DATE REVIEWED: June 27, 1986

ANTICIPATED DRAFT PERMIT DATE: 6/30/86

ANY ON-GOING STATE/FED 264, 265, or 270 CORRECTIVE ACTION: None

DOES FACILITY HAVE A CERCLA FILE? YES ☒ NO ☐

CERCLIS HAZSIT NUMBER: TXD04588

TYPE OF DRINKING WATER SUPPLY WITHIN A 3-MILE RADIUS:
Unable to determine from information contained in PA.

TARGET POPULATION WITHIN A 3-MILE RADIUS:
Primarily population of the cities of Groves and Port Arthur, Texas: approximately 60,000.

RECOMMENDATIONS: ☒ S.I. ☐ R.I. ☐ I.N. ☐ 3004(u) ☐ 3004(v)
☐ 3007 ☐ No further Action

Possible Enforcement Actions: ☐ 3008(a) ☐ 3008(b)

I. Preliminary Assessment of Prior or Continuing Releases of Solid Waste Management Units (SWMUs)

A. Evaluation of Information

1. The main purpose is to determine whether there has been or may have been a release(s) of hazardous waste or hazardous constituents from any SWMUs which will require corrective action measures under Section 3004(u) of the RCRA Hazardous and Solid Waste Amendments (HSWA) of 1984. The SWMUs units of concern are:

- a) SWMUs not regulated under RCRA; and
- b) SWMUs regulated under RCRA regardless of whether they are subject to ground water monitoring requirements.

2. The purpose of this review is to:

- a) Identify all SWMUs;
- b) Identify if there has been prior or continuing releases of hazardous wastes or hazardous constituents from such units to any media (air, surface water, ground water, soil & sub-surface gas);
- c) Identify if such releases caused environmental contamination that would require corrective action; and
- d) Determine what additional information or investigation is needed to clarify whether there has been a release or if a potential for a release exists.

B. NUMBER OF SOLID WASTE MANAGEMENT UNITS (SWMU): 9

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>STATUS**</u>	<u>SUBJECT TO GWM SUBPART F</u>
(1) Surface Impoundment	Y	A	Y
(2) Tank (660)	Y	A	N
(3) Below Grade Tank (Surf. Imp.)	Y	A	?
(4) Container Storage Area	N	A	N
(5) Landfarm	N	I	N
(6) Biol. Tmnt. Aeration Pond	N	A	N
(7) Stormwater Retention Basin	N	A	N
(8) Waste Disposal Well	N	I	N
(9) Container Storage Area	N	A	N

* Y - Yes

N - NO

? - unknown

** Active or Inactive (A or I)

GWM-Ground Water Monitoring

C. NUMBER OF SWMU AT WHICH RELEASES HAVE BEEN IDENTIFIED: 0

(If any releases have been identified, an RI for the entire facility should be conducted, SI will not be necessary.)

D. NUMBER OF SWMU AT WHICH A RELEASE IS HIGHLY POSSIBLE: 3

(SIs should be conducted for each SWMU in this category unless an RI under C. has been indicated which will include this SWMUs).

LIST OF SWMU

REASONS (i.e., Waste characteristics, depth of GW, soil permeability, etc.)

- (1) Surface Impoundment (NOR-1) -Overtopping and lack of freeboard.
- (2) Container Storage Area(NOR-4) -Partially empty drums stored upside down drum spewing contents on ground-pressurized from sun's heat; and drums improperly closed had collected rain-water.
- (3) Landfarm -Improper closure due to lack of sampling; high potential for releases to groundwater considering waste management practices.

E. NUMBER OF SWMU WHERE A DETERMINATION OF RELEASE CAN NOT BE MADE DUE TO LACK OF INFORMATION: 2

(SIs should be conducted for each SWMU in this category unless an RI under C. has been indicated which will include this SWMUs).

LIST OF SWMU

- (1) Below Grade Tank (surface impoundment)
- (2) Biological Treatment Aeration Pond

F. NUMBER OF SWMU WITH NO INDICATED RELEASES: 4
(Documentation is necessary for a SWMU to be included in this category).LIST OF SWMU

- (1) Tank 660 (NOR-2)
- (2) Container Storage Area
- (3) Waste Disposal Well
- (4) Stormwater Retention Basin

11. RECOMMENDATIONS: (EPA, STATE and/or CONTRACTOR)

EPA concurs with TWC's recommendation for a Site Investigation at the following units: Surface Impoundment (N.O.R. 1); Container Storage Area (N.O.R. 4); and Biological Treatment Aeration Pond. EPA further recommends that the Below-grade Tank be included in the site investigation. This noted by TWC in their PA summary but not specifically on the unit checklist. In addition, it will be necessary to assess the inactive landfarm as a separate unit and to include it in the Site Investigation.

We agree with TWC that no further action is needed at the following units: Tank 660 (N.O.R. 2); Container Storage Area; Waste Disposal Well; and Stormwater Retention.

CONCUR: _____

DATE: _____